

**REMARKS**

Claims 1, 3, 6, 8, 11 and 13 have been amended. No new matter has been added.

**Claim Objections**

Claims 1, 3, 6, 8, 11 and 13 were objected to for informalities. In response, these claims have been amended to remove informal subject matter. Reconsideration of these claims as amended and withdrawal of the objections is respectfully requested.

**Claim Rejections Under 35 U.S.C. §102**

Claims 1-3, 5-8, 10-13 and 15 stand rejected under 35 U.S.C. §102(b) as being anticipated by Beakes (US 6,131,182). Applicants respectfully traverse.

Independent claim 1 recites the following limitations:

determining at least a plurality of slews of output timing events for a plurality of input timing events based on a timing model of a gate; and

selecting a worst-case input timing event from the plurality of input timing events based on at least the slews of the output timing events.

Applicants respectfully submit that Beakes does not disclose or suggest such limitations.

Beakes is directed to processes for automatically compiling and optimizing control logic for digital integrated circuits. In particular, Beakes describes a computer-based method for synthesizing, optimizing and compiling high performance control logic using self-resetting complementary metal oxide semiconductor (SRCMOS) logic array macros (SLAMs).

According to Beakes, the delay of a gate depends on the pattern of inputs. A delay model of a macro is constructed by assembling delay models of the individual gates within the macro, and the maximum and minimum delays are obtained by summing the maximum and minimum delays of the individual gates. A worst-case delay path is identified by generating input patterns to achieve the worst-case performance. Beakes specifically discloses that the actual delay of the macro is determined using the resulting input pattern. *See Beakes, col. 14, lines 9-42.*

In contrast to Beakes, independent claim 1 requires determining at least a plurality of slews of output timing events for a plurality of input timing events based on a timing model of a gate, and selecting a worst-case input timing event from the plurality of input timing events

based on at least the slews of the output timing events. Support for these features of independent claim 1 can be found throughout the Applicant's specification, for example, in paragraph 25.

Beakes does not disclose these limitations of the present claim. Instead, as noted above, Beakes explicitly teaches that a worst-case delay path is only identified by generating input patterns to achieve the worst-case performance. There is no teaching or suggestion in Beakes that slews are used in any manner to determine a worst-case delay path.

For at least these reasons, it is respectfully submitted that independent claim 1, as amended, is not anticipated by the cited Beakes reference.

For at least these same reasons, it is respectfully submitted that independent claims 6 and 11, as amended, are likewise not anticipated by the cited Beakes reference.

Since claims 2-5, 7-10, and 12-15 depend from independent claims 1, 6, and 11, respectively, these dependent claims are also not anticipated and are therefore allowable over the cited Beakes reference.

#### **Claim Rejections Under 35 U.S.C. §103**

Claims 4, 9 and 14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Beakes in view of Jess (US 2004/0002844). Applicants respectfully traverse.

The ancillary Jess reference does not remedy the deficiencies of Beakes. For example, the Action concedes that Jess does not disclose the same formula recited in present claim 4, but the Action purports that Jess considers input slew and output slew. However, Jess fails to disclose or suggest the means for applying input and output slew to the teachings of Beakes to achieve the claimed features of the present claims. Accordingly, Applicant respectfully asserts that any combination of these cited references is merely based on the Applicant's disclosure and is thus improper.

In any case, since claims 4, 9 and 14 depend from independent claims 1, 6, and 11, respectively, these dependent claims are not anticipated by the cited references and are therefore allowable over the cited references.

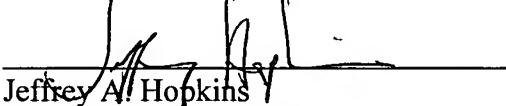
**Conclusion**

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-2518**, referencing billing number **7017522001**. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-2518**, referencing billing number **7017522001**.

Respectfully submitted,  
Bingham McCutchen LLP

Date: May 10, 2006

By: 

Jeffrey A. Hopkins  
Registration No. 53,034

Three Embarcadero Center, Suite 1800  
San Francisco, California 94111  
Los Angeles, CA 90071-3106  
Telephone: (213) 680-6400  
Telefax: (213) 680-6499